

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SECURITIES AND EXCHANGE COMMISSION,

No. 2:22-cv-01563-TL

Plaintiff,
v.

STIPULATION TO EXTEND DEADLINES

DOUVER TORRES BRAGA,
JOFF PARADISE, and
KELEIONALANI TAYLOR,

Defendants.

I. STIPULATION

Plaintiff Securities and Exchange Commission (“SEC”) and the sole appearing Defendant in this matter, Douver Torres Braga, hereby stipulate to an extension of the deadlines for the submission of Initial Disclosures and for the filing of the Joint Status Report by approximately thirty (30) days.

Pursuant to Judge Lin's Standing Order for All Civil Cases, the Parties have agreed to move the following deadlines.¹ The Parties request that the Clerk reset the deadlines as noticed.

¹ Judge Lin's Standing Order provides that the Parties are permitted to automatically extend a deadline if, among other things, "the date has not been previously automatically extended." Standing Order, III. A. The Parties note that these deadlines have not been previously automatically extended, but they were extended once by a joint motion and order by Judge Martinez. Dkt. #38.

Filing/Submission	Current Deadline (Dkt. #38)	New Deadline
Initial Disclosures	March 7, 2025	April 7, 2025
Joint Status Report	March 25, 2025	April 25, 2025

Defendant Braga has requested this extension from the SEC, and the SEC does not oppose the request, because Defendant was recently arrested and presented in the related criminal matter also before this Court, *United States of America v. Braga*, United States District Court for the Western District of Washington, Case Number CR22-169-TL, and requires additional time to evaluate the two related cases.

No party will be prejudiced by extension of these deadlines because no other defendants named in this matter have yet appeared.

DATED this 27th day of February 2025.

The undersigned certify that this memorandum contains 243 words, in compliance with the Local Civil Rules.

LEATHER LAW GROUP

/s/ Eric J. Neal

/s/ Kasie Kashimoto

Eric J. Neal, WSBA #31863
Kasie Kashimoto, WSBA #54268
1848 Westlake Avenue N, Suite 100
Seattle, WA 98109
P: (206) 467-5444/F: (206) 467-5544
eneal@letherlaw.com
kkashimoto@letherlaw.com

THE VOLKOV LAW GROUP PC

/s/ Michael Volkov

/s/ Matthew J. Stankiewicz

Michael Volkov, *admitted pro hac vice*
Matthew J. Stankiewicz, *admitted pro hac vice*

SECURITIES EXCHANGE
COMMISSION

/s/ John K. Han

John K. Han
(Conditionally Admitted Pursuant to
LCR 83.1(c)(2))
CA Bar #208086
Securities and Exchange Commission
44 Montgomery Street, Suite 700
San Francisco, California 94104
Telephone: (415) 705-2500
Facsimile: (415) 705-2501
Email: hanjo@sec.gov
*Attorney for Plaintiff Securities and
Exchange Commission*

1 155 Palisade Ave
2 Jersey City, NJ 07306
3 P: 732-979-9771
4 mvolkov@volkovlaw.com
5 mstankiewicz@volkovlaw.com
6 *Attorneys for Douver Torres Braga*

7 **II. ORDER**

8 IT IS SO ORDERED.

9 DATED this 27th day of February 2025.

10 
11 Honorable Tana Lin
12 United States District Judge